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FILED/ACCEPTED
JUN 19 2008
Federal Communications Commission
Office of the Secretary

June 19, 2008

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *In the Matter of Petition of Qwest Corporation for Forbearance Pursuant to 47 U.S.C. § 160*(c) *in the Denver, Minneapolis-St. Paul, Phoenix and Seattle Metropolitan Statistical Areas,* WC Docket No. 07-97

Dear Ms. Dortch:

Qwest Corporation ("Qwest") responds to numerous *ex partes* filed with the Federal Communications Commission ("Commission") in which certain of Qwest's competitors seek to perpetuate the myth that McLeodUSA Incorporated ("McLeod") has been forced to exit the residential and small business telephone market in Omaha due to the Commission's limited grant of forbearance to Qwest in the *Omaha Forbearance Order.* As the Commission is no doubt aware, its December 2005 grant of forbearance to Qwest in nine wire centers within the Omaha Metropolitan Statistical Area ("MSA")[1] has become the *cause celebre* for all those who oppose Qwest's petitions for similar relief in Denver, Minneapolis-St. Paul, Phoenix and Seattle.

As described below, the facts demonstrate that McLeod's actions in the Omaha market have nothing to do with the Commission's grant of forbearance, but have everything to do with McLeod's announced national strategic marketing plan -- to focus on small and medium-sized business enterprise customers. Qwest's competitors' strategy is to repeat the "McLeod was forced from the Omaha market due to forbearance" mantra enough that it becomes viewed as fact -- even though it is untrue. The Commission should not fall for this campaign of misinformation.

TDS Metrocom, LLC ("TDS") is one of the parties to weigh in with its view of the effects of forbearance on the competitive marketplace in Omaha, and like other opposing parties in this proceeding -- who similarly have no direct knowledge of actual market conditions in

[1] *In the Matter of Petition of Qwest Corporation for Forbearance Pursuant to 47 U.S.C. §160(c) in the Omaha Metropolitan Statistical Area*, Memorandum Opinion and Order, 20 FCC Rcd 19415 (2005) ("*Omaha Forbearance Order*"), *pets. for rev. dismissed and denied on the merits, Qwest v. FCC*, 482 F.3d 471 (D.C. Cir. 2007).

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Omaha -- TDS has added its embellishments to the Omaha myth that has been held out as proof that the Commission created a disaster in Omaha by granting Qwest Section 251 forbearance relief in nine wire centers. At Slide 11 of its May 13, 2008 *ex parte* presentation ("TDS May 13 *ex parte*"), TDS has misquoted McLeod's petition in Nebraska by stating that McLeod had requested approval "to cease providing local voice services in Nebraska to **all** residential and small business customers" when, in fact, McLeod sought approval "to cease providing local exchange switched voice services in Nebraska to **certain** residential and small business customers."

Qwest's competitors have not examined the facts about the very competitive Omaha market, McLeod's fortunes in Omaha prior to the forbearance decision, and McLeod's changing business plans. It is very apparent that McLeod's fortunes were waning in the residential and very small business markets in Omaha well before the Commission issued its *Omaha Forbearance Order*, a condition aggravated by Cox Communications, Inc.'s ("Cox") strong and continuing successes into both markets.[2] Qwest's competitors are simply seizing the political opportunity to leverage McLeod's troubles in the residential and very small business markets as "proof" that forbearance is the cause of McLeod's difficulties in Omaha. This mischaracterization is without foundation. Qwest seeks to correct the numerous Omaha-related inaccuracies that have been put forth in this docket, as if they were facts, by Qwest's competitors.

I. TWO AND ONE-HALF YEARS AGO, McLEOD EMBARKED UPON A MAJOR SHIFT IN ITS COMPANY-WIDE BUSINESS STRATEGY TO DIVORCE ITSELF FROM ITS HISTORIC BASE OF RESIDENTIAL AND VERY SMALL BUSINESS CUSTOMERS AND TO FOCUS INSTEAD ON WHAT IT PERCEIVED AS THE MORE PROFITABLE SMALL- AND MEDIUM-SIZED ENTERPRISE MARKET.

In January 2006 McLeod concluded that its best chance for success in the highly competitive telecommunications market was to shift its focus -- everywhere McLeod provides service in the United States -- to the enterprise market, where it perceives greater margin and revenue opportunities to lie, and away from residential and very small business customer markets. Yet, in its recent petition to "cease providing local exchange switched voice services in Nebraska to certain residential and small business customers," McLeod informed the Nebraska Public Service Commission ("PSC") that the *Omaha Forbearance Order* was the reason for its intended departure from that market.

[2] *See* http://www.networkworld.com/news/2006/102406-cable.html; and *see also* http://www.psc.state.ne.us – Nebraska Public Service Commission Annual Reports to the Legislature on the Status of The Nebraska Telecommunications Industry at 1-3.

A. What McLeod Has Publicly Reported To Its Investors And What It Has Told The Nebraska PSC Are Remarkably Different. Both Cannot Be Accurate.

In filings before the Securities and Exchange Commission ("SEC") in May 2007, McLeod was forthright about its shift to a new, company-wide business strategy beginning in January 2006, designed to enhance its prospects for future success in an evolving and competitive telecommunications marketplace. McLeod stated that it would meet its strategic goals by moving away from its historic base of residential and very small business customers and shifting its focus to the small and mid-sized enterprise markets.

> We emerged from Chapter 11 on **January 6, 2006** with a new chief executive officer, board of directors and equity ownership. At the same time, **we shifted our business strategy to focus on providing services based on high-speed digital transmission connections**, known as T-1 circuits, which we believe offer greater value to customers, increase customer retention and provide revenue growth opportunities for us. Our goal is to provide services that improve our customer's daily productivity, simplify their networks and provide them with control of their network. **Our new strategy focuses on sales to small- and medium-sized enterprise customers who seek high-capacity services. These enterprises generate greater revenue and profit margins than the services sought by residential and very small business customers, which were our historic focus.**[3] (Emphasis added.)

McLeod defined this new target market vs. its historic target market in terms of revenue per month:

> In the past, we focused on delivering a broad portfolio of products to a wide spectrum of customer segments including residential, small- and medium-sized enterprises, other carriers and internet service providers, and, to a lesser extent, large corporate enterprises. This strategy resulted in a large base of small and lower margin customers with monthly billings of up to $200 per month per location. **Upon our January 2006 emergence from our second bankruptcy, we shifted our business strategy to focus on providing higher value bundles of integrated voice, broadband internet access and other data services to enterprise customers** with average monthly telecommunications bills of $500 to $5,000 per location.[4] (Emphasis added.)

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[3] Form S-4/A filed with the United States Securities and Exchange Commission by McLeodUSA Incorporated on May 9, 2007 at 48-49 ("McLeod May 9 Form S-4/A") (http://www.sec.gov/Archives/edgar/data/919943/000104746907003936/a2177169zs-4a.htm).

[4] *Id.* at 26.

Moreover, McLeod went on to defend its decision to leave the residential and very small business market behind in favor of the small- and medium-sized enterprise market with the following observation:

> **While RBOCs remain the market leaders in their service territories, competitive communications providers continue to gain market share among small- and medium-sized enterprises.** We believe that the RBOCs have neglected small- and medium-size enterprises due to their increased focus on the global enterprise business market, **increased competitive pressures in the residential markets**, continued integration of recent mergers and acquisitions and investment in "triple-play" product offerings. **We believe this has created an increased demand for alternatives in the small- and medium-sized enterprise communications market, which we believe provides sustainable growth opportunity for us**.[5] (Emphasis added.)

McLeod told quite a different story to the Nebraska PSC, however, when it filed its petition on April 11, 2008, to "cease providing local exchange switched voice services in Nebraska to certain residential and small business customers for whom McLeodUSA requires access to last mile loop network facilities."[6] Left unsaid in McLeod's petition, of couse, is the fact that McLeod will continue to compete in the Omaha market for small and medium-sized enterprise customers.

In its application to cease provision of service to certain residential and small business customers, McLeod also informed the Nebraska PSC that it "has withdrawn its direct sales force from the Omaha MSA **as a result of the forbearance ruling**" but that "it plans for at least the near term to continue to serve its larger existing business customers in the Omaha MSA."[7] Once again, a very different story was told to investors and to the SEC. In its May 2007 filing with the SEC, McLeod made the following statement:

> To address our target customers, we have shifted most of our sales resources from telemarketing to field and agent sales and have focused on geographic areas with potential enterprise customers who will use our services in multiple locations.[8]

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[5] *Id.* at 49.

[6] Application No. C-3922, Petition of McLeodUSA Telecommunications Services, Inc. to Cease Providing Local Exchange Voice Services in Nebraska Wire Centers, filed Apr. 11, 2008 at 1. McLeod's petition was approved by the Nebraska PSC on May 28, 2008.

[7] *Id.* (Emphasis added.)

[8] McLeod May 9 Form S-4/A at 2.

Based on the following comments made to investors by McLeod CEO Royce Holland four months later, McLeod apparently concluded that Omaha was not one of the geographic areas with that potential:

> But once again, Omaha is a very small market, one that we really haven't sold in, in two years. It's not one -- we've got too many other opportunities that are way underutilized with some of our large networks everywhere to put salespeople and putting them in Omaha didn't make a lot of sense.[9]

It is clearly disingenuous of McLeod to claim in its petition before the Nebraska PSC that "the forbearance ruling" was solely to blame for McLeod's decision to withdraw its direct sales force from Omaha.

B. McLeod's Nebraska Access Line Base Peaked In 2002 And Declined By More Than 30 Percent In The Three Years Prior To The *Omaha Forbearance Order.*

Qwest's competitors would like this Commission to believe that McLeod was experiencing great success in Omaha until the Commission "carpet bombed" competition in Omaha with its December 2005 *Omaha Forbearance Order*.[10] Such was not the case, however. According to access line data for the years 2000 through 2006 that are publicly available on the Nebraska PSC's own website,[11] McLeod's Nebraska access lines nearly tripled between 2000 and 2002, reaching their high point during 2002, and have dropped significantly each year since that time.[12] In the three years leading up to the *Omaha Forbearance Order* -- *i.e.*, between December 2002 and December 2005 -- McLeod's access line base in Nebraska decreased by a total of 31 percent. These losses cannot credibly be attributed to the *Omaha Forbearance Order*, which was not released until December 2005.[13]

McLeod's losses in Nebraska during the 2002-2005 timeframe mirrored its rate of customer losses across its entire 25-state footprint. In financial reports filed with the SEC, McLeod reported a customer base of 432,084 as of December 2002. By September 2005, its

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[9] http://www.secinfo.com/d14D5a.u66q2.htm, visited May 12, 2008.

[10] Comments of McLeodUSA CEO Royce Holland, NARUC Annual Conference, Nov. 10, 2007.

[11] *See* http://www.psc.state.ne.us.

[12] Because the Omaha metropolitan MSA comprises roughly 40 percent of the population of the state of Nebraska, Qwest believes the statewide numbers to be indicative of the relative gains and losses experienced by McLeod in Omaha.

[13] *See* note 1, *supra.*

reported number of customers had declined by 26 percent, to 318,953.[14] In its third quarter 2005 reports to the SEC, McLeod was blunt about its financial struggles over the prior three years and the challenges it expected to face going forward:

> Since 2002, the Company's revenues have not increased as forecasted but have been declining. **Reasons for the decline in revenue include weakness in segments of the telecommunications industry, turnover of customers to competitors in excess of new customers acquired, reduction of long distance minutes used by our customer base, reduction in access rates as mandated by the FCC, and lower prices for some of our products.** In response to these challenges, we have taken a number of actions, including introduction of new competitively-priced and technologically advanced products, reorganization of the sales operations, hiring of experienced executive sales leadership, expanding the involvement of the executive staff in the sales process and reducing customer churn. **However, these actions to date have not resulted in profitable new revenue growth which continues to be a challenge as we compete against large, financially strong competitors with well-known brands.** In addition, we believe that the large telecommunications providers will likely become even more aggressive upon the closing of the pending recently approved mergers of AT&T with SBC and MCI with Verizon as well as anticipated additional consolidation in the telecommunications industry, further challenging our ability to grow revenue.[15] (Emphasis added.)

Clearly, the Commission's grant of forbearance to Qwest in just nine of 24 wire centers in the "very small" Omaha market was the least of the problems facing McLeod by the end of 2005, and it certainly was not the driving force behind McLeod's *company-wide* decision in January 2006 to shift away from its historic residential and small business base to the enterprise market which was perceived by McLeod to be more profitable.

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[14] Form 8-K filed with the United States Securities and Exchange Commission by McLeodUSA Incorporated on Apr. 24, 2003 (http://www.sec.gov/Archives/edgar/data/919943/000095017203001305/0000950172-03-001305.txt) and Form 8K filed with the United States Securities and Exchange Commission by McLeodUSA Incorporated on Nov. 9, 2005 (http://www.sec.gov/Archives/edgar/data/919943/000134100405000234/0001341004-05-000234.txt).

[15] Form 10-Q filed with the United States Securities and Exchange Commission by McLeodUSA Incorporated on May 9, 2007 at 17. (http://www.sec.gov/Archives/edgar/data/919943/000110465905054087/a05-18113_110q.htm).

II. MCLEOD'S DESCRIPTION OF THE COMPETITIVE PRESSURES IT FACES IS STRIKINGLY SIMILAR TO THE COMPETITIVE PRESSURES IDENTIFIED BY QWEST IN ITS PETITIONS FOR FORBEARANCE IN THIS PROCEEDING.

Remarkably, in its filing with the SEC McLeod recites the many risks relating to survival in the telecommunications industry, and lists among *its* competitors some of the very same intermodal competitors that McLeod and other competitive local exchange carriers ("CLECs") ask the Commission to dismiss as competitors of *Qwest's* in this proceeding.[16]

> The market for communications services is highly competitive and we expect the competition to intensify. **We compete with many types of communications providers, including traditional local telephone companies, cable companies, new IP-based service providers and other managed service providers** with similar business models to our own. Our current or future competitors may provide services that are comparable or superior to those that we provide, or at lower prices, or adapt more quickly to evolving industry trends or changing market requirements.[17] (Emphasis added.)

In the very next paragraph, McLeod makes clear that its "target customers are small- and medium-sized enterprises and multi-location customers within [its] geographic footprint."[18] Therefore, there can be no doubt that McLeod considers its competitors *in the small- and medium-sized enterprise market* to include, among others: cable companies; new IP-based service providers; other managed service providers; and traditional local telephone companies.

McLeod also outlines the current and growing threat to its wireline business that is presented by the increased availability and popularity of wireless alternatives:

> The communications industry has experienced, and we believe will continue to experience, rapid and significant changes in technology. **Technological changes, such as the use of wireless network access, could render aspects of our technology suboptimal or obsolete and provide a competitive advantage to**

[16] *See, e.g.*, TDS May 13 *ex parte* at Slide 9: "Cable is not a serious player in the enterprise market" and XO/Covad *ex parte* notification, May 14, 2008, Slide 8: "Wireless lines today are not a complete substitute for wireline services in any product market."

[17] McLeod May 9 Form S-4/A at 26.

[18] *Id.* Again, Qwest cannot emphasize strongly enough that McLeod turned away from the residential and very small business market long before its filing to exit "certain" residential and small business markets in Nebraska in April 2008. This filing, in which McLeod identifies its target market as "small- and medium-sized enterprises and multi-location customers," was made in May 2007.

> **new or larger competitors** who might more easily be able to take advantage of these opportunities.[19] (Emphasis added.)
>
> **The wireless telecommunications industry is experiencing** increasing competition, consolidation, significant technological change and **rapid growth.** Wireless internet services, high-speed data services and other more advanced wireless services are also gaining in popularity. **These developments may make it more difficult for us to gain and maintain our share of the communications market, which may facilitate the migration of wireline usage to wireless services.** We could also face additional competition from users of new wireless technologies including, but not limited to, currently unlicensed spectrum. In addition, **some governmental entities are contracting with individual companies to construct and operate government subsidized wireless networks using WiMax technology** to offer high-speed internet connectivity throughout a city or county.[20] (Emphasis added.)

Again, McLeod competes in the small- and medium-sized enterprise market, and it recognizes in these statements to the SEC that it could very well *lose market share* to its wireless competitors. It is apparent from this discussion that McLeod considers wireless to be a substitutable service in the small- and medium-sized enterprise market.

To be sure, McLeod includes "additional grants of forbearance to RBOCs by the Commission that negatively impact our ability to interconnect and access bottleneck wireline network elements required to serve customers" as one of its potential risks. However, the threat of forbearance is just *one* of *thirty* bulleted items presented by McLeod in its list of "some, but not necessarily all, of the factors that may cause actual results to differ from those anticipated or predicted."[21] Most of the other factors included on McLeod's list are the same risks faced by Qwest or any other competitor in the telecommunications industry. For example, "changing market conditions," "ability to attract new customers, retain existing customers and increase revenues," "ability to keep pace with rapid technological changes," "increased competition in the communications services markets," "developments in the wireless telecommunications industry," and "ability to develop new products and services that meet customer demands" are just a few of the other twenty-nine factors identified by McLeod as potentially affecting its forecasted results. Again, there is no basis to conclude that McLeod's actions in the Omaha market are based on the Commission's *Omaha Forbearance Order*.

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[19] *Id.* at 29.

[20] *Id.* at 34.

[21] *Id.* at 40-41.

III. CONTRARY TO CLAIMS MADE BY McLEOD AND OTHER CLECS, THERE HAS BEEN NO MASS EXODUS FROM OMAHA BY QWEST'S COMPETITORS.

As the Commission is well aware, Qwest does not have access to its competitors' specific access line counts in Omaha, or in any other market. Similarly, Qwest suspects that those who have proclaimed the demise of competition in Omaha would only have access to their *own* access line counts -- assuming they even compete in Omaha (which most of the commenters in this proceeding do not). However, reports from the Nebraska PSC that are publicly available support Qwest's position that the *Omaha Forbearance Order* has not driven competition from the Omaha market.[22]

In fact, these reports show that between December 2005 and December 2006 (the latest report available), the relative distribution of *reported* Nebraska access lines among Qwest, Cox Communications and all other CLECs in Nebraska remained relatively stable:[23]

- Qwest's statewide share continued downward, from 28.4% to 27.5%.
- Cox -- which only competes in the Omaha market -- increased its statewide share from 15.4% to 16.3%.
- The combined statewide share of "All Other CLECs" grew slightly, from 14.4% to 14.9%.

Because the Omaha metropolitan area comprises such a significant share of the state's population, any dramatic adverse effects on competition caused by the *Omaha Forbearance Order* would have been at least somewhat evident in the statewide market share data reported by the Nebraska PSC. However, there is no such evidence of the "carpet bombing" of competition claimed by McLeod.

The number of access lines reported to the Nebraska PSC also reflects the nature of telecommunications competition in the state. Between December 2005 and December 2006 the *total* number of wirelines (incumbent local exchange carrier ("ILEC") and CLEC) reported to the Nebraska PSC decreased by about 30,000 -- a three percent drop. During roughly the same period of time (July 2005 to July 2006), the U. S. Census Bureau estimated that Nebraska

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[22] *See* http://www.psc.state.ne.us. Because the Omaha metropolitan area comprises such a significant portion the population of the state of Nebraska (*i.e.*, about 40%), Qwest believes the statewide numbers present a fair proxy for the status of competition in Omaha. Qwest notes, however, that the primary cable provider in Nebraska -- Cox -- competes only in Omaha, so its share of the Omaha market would be significantly greater than its share of the statewide market in the geographic areas served by Qwest and all other ILECs.

[23] Annual Report to the Legislature on the Status of the Nebraska Telecommunication Industry, Nebraska Public Service Commission, reports submitted Sept. 30, 2006 and Sept. 28, 2007 at 3.

experienced a 0.55 percent growth in population. Between 2000 and 2006, reported ILEC and CLEC wirelines dropped by 18 percent while population increased three percent. Clearly, Qwest, other ILECs, and traditional wireleine CLECs are all sharing a declining piece of the Nebraska telecommunications "pie" while intermodal competitors -- such as wireless providers and non-regulated Voice over Internet Protocol ("VoIP") providers -- whose access line counts are not included in the Nebraska PSC's access line counts gain a larger share of the "pie." Indeed, in its report of 2006 access lines, the Nebraska PSC includes the following note:

> Wireless access lines reported for relay remittance purposes at the end of 2006 were 1,042,720. When combined with the wireline access lines above [*i.e.*, 936,745] the telecommunications industry has nearly 2 million access lines in service.[24]

As noted in other *ex partes* filed by Qwest, the recent National Health Interview Survey indicated 15.8 percent of households nationwide had "cut the cord" and no longer had a landline telephone as of December 2007.[25]

Certainly, the voice services provided by a host of VoIP providers are also cutting into the share of access lines previously held by wireline providers. As described in Qwest's petition and *ex partes*, VoIP-based providers such as Vonage and AT&T "CallVantage" have gained a significant toe-hold in the market. In addition, facilities-based providers such as Level 3 are enabling VoIP-based services. Level 3 has had a network presence in Omaha since 2003, and its current network map indicates that Omaha is an "On-Net Market with Metro Fiber Network."[26] Level 3 provides a host of VoIP services to both residential and business customers through its Level (3) Enabled℠ Service Providers, which Level 3 describes as "industry-leading VoIP, IP and data solution vendors."[27] And, as recently as January 2008, 360networks -- a leading facilities-based provider of wholesale VoIP communications services in the western United States -- announced that it was expanding VoIP coverage into the state of Nebraska, including Omaha and other cities throughout the eastern half of the state.[28]

Contrary to the claims of other parties in this docket, the Commission's predictive judgment in Omaha *has* been realized. Cox has continued to gain market share in both the

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[24] *Annual Report to the Legislature on the Status of the Nebraska Telecommunications Industry*, Nebraska Public Service Commission, Sept. 28, 2007 at 3.

[25] Wireless Substitution: Early Release of Estimates From the National Health Interview Survey, January-June 2007, rel. Dec. 10, 2007.

[26] *See* http://www.level3.com/newsroom/pressreleases/2003/20030605.html and http://www.level3.com/images/global_map/Level_3_Network_map.pdf.

[27] *See* http://www.level3.com/wholesale/enabled_service_providers/index.html.

[28] *See* http://www.360networks.com/news.asp?PRID=15.

residential and business markets, competition is flourishing and Qwest has not "remonopolized" the market.

IV. CONCLUSION.

As demonstrated above, the claims of TDS, McLeod and other Qwest competitors that the *Omaha Forbearance Order* has driven McLeod out of the Omaha market are completely false. The truth is McLeod has only exited the market segment it wanted to exit, driven out not by the *Omaha Forbearance Order* but rather, by its own refocused company-wide business plan. Independent of the *Omaha Forbearance Order,* McLeod implemented a new nationwide strategy to focus on small- and medium-sized enterprise customers in major markets -- where it perceives greater revenue and margin opportunities -- and determined that it would move away from the residence and very small business markets. McLeod's company-wide plan was established two and one-half years ago, not just in Omaha, but across all of McLeod's markets. Importantly, McLeod has not petitioned the Nebraska PSC to exit the market on which it intends to focus as part of its national plan: small- and medium-sized enterprise market.

Significantly, none of the parties that have claimed the *Omaha Forbearance Order* has destroyed competition in Omaha has come forth with any actual evidence to back up those claims. These parties simply repeat the false "sound bite" that McLeod has been "driven from the market" by the *Omaha Forbearance Order.* They hope that if they keep saying it over and over, eventually this fiction will be taken as fact and will cause the Commission to reject forbearance in four MSAs where competitive conditions warrant granting Qwest relief. The Commission should not be duped by these claims.

Respectfully submitted,

R. Steven Davis

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